## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

IN THE MATTER OF:	)	
	) Bk. Case No:	
	)	
	) Chapter 13	
Debtor(s).	)	
	) Hearing Date:	
	) Response Date:	
NOTICE OF MOTION	UNDER 11 U.S.C. SEC. 362 (c)(3	3)(B)
TO: All creditors on the matrix		
Michael B. Joseph, Esquire		
Chapter 13 Trustee		
P.O. Box 1350		
Wilmington, Delaware 19899-1350		
and (List secured creditors affected by stay)		
The Debtor(s),	, have filed a Motion for Contin	uation of the Automatic
Stay Pursuant to 11 <u>U.S.C.</u> Sect. 362(c)(3)(I		
States Bankruptcy Court, Clerk of the Cour	rt, 824 Market Street, Wilmington, I	Delaware 19899, and a
copy sent to Debtor's counsel at		
on or before .	A hearing will be held on	at .

Counsel for Debtor

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

IN THE MATTER OF:	)
	) Bk. Case No:
	)
	) Chapter 13
Debtor(s).	)
MOTION FOR CONT	INUATION OF THE AUTOMATIC STAY
PURSUANT	TO 11 U.S.C. SEC. 362(c)(3)(B)

**COMES NOW,** 

DUTTIE MATTED OF.

("Debtor(s)") by and through their attorney

, who respectfully moves this Honorable Court for continuation of

the Automatic Stay pursuant to  $11 \, \underline{\text{U.S.C.}}$  Sec. 362(c)(3)(B). In support of the motion, Debtor(s) submits the following:

- 1. The Debtor(s) filed a voluntary petition under Chapter 13 on
- The Debtor(s) had a prior Chapter 13 case that was filed on , being Case No:
  (the "prior case").
- 3. The Order dismissing the prior case was subsequently entered by the Court on (date of dismissal of prior case).
  - 4. Debtor(s) submits that the current Chapter 13 case is filed in good faith.
- 5. Debtor(s) submits that there are changed circumstances that will allow the current case to succeed wherein the prior case had not, as follows: (specify the facts and circumstances that will justify an extension of the stay).
  - 5. Debtor(s) home is necessary for an effective reorganization.

WHEREFORE, Debtor(s), having demonstrated good faith, requests that this Court extend the		
automatic stay pursuant to 11 <u>U.S.C.</u> Sec. 362(c)(3)(E	3).	
	Counsel for Debtor	
VERIFICATION:		
I declare under penalty of perjury under the laws is true and correct.	of the United States of America that the foregoing	
Dated:	Debtor	

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

DI THE MATTER OF	,
IN THE MATTER OF:	)
	) Bk. Case No:
	)
Dolato ((a)	) Chapter 13
Debtor(s).	)
	ORDER
	<del></del>
HAVING REVIEWED AND CONS	SIDERED the Debtor(s) Motion for Continuation of the
Automatic Stay, and after good faith demonstra	nted:
IT IS SO ORDERED THAT:	
The Automatic Stay is extended	d pursuant to 11 <u>U.S.C.</u> Sec. 362(c)(3)(B).
SO ORDERED this day of	
	UNITED STATES BANKRUPTCY JUDGE